

Alameda County Make Prisoners, et al. vs. ACSO, et al., Case No. 3:19-cv-07423-JSC

PLAINTIFFS' EXHIBIT D

Responses to Requests for Admissions from Deputy
Ignont

With Proofs of Service Attached

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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

ALAMEDA COUNTY MALE PRISONERS
And Former Prisoners, DANIEL GONZALEZ,
et al. on behalf of themselves and others
similarly situated, as a Class, and Subclass;

PLAINTIFFS,

v.

ALAMEDA COUNTY SHERIFF'S
OFFICE, ALAMEDA COUNTY, Deputy
Joe, Deputy Ignont (sp) John and Jane ROEs,
Nos. 1 – 25,

DEFENDANTS.

Case No. 3:19-cv-07423-JSC

**PLAINTIFF DARRRYL GEYER'S
RESPONSE TO INTERROGATORIES
FROM DEFENDANT DEPUTY IGNONT,
SET ONE**

Judge: District Judge Jacqueline Scott
Corley

Trial Date: May 6, 2024

RESPONDING PARTY:

Plaintiff DARRYL GEYER

PROPOUNDING PARTY:

Defendant DEPUTY IGNONT

SET NO.:

ONE (1)

1 Pursuant to Federal Rule of Civil Procedure 36 and 26(d)(1), Defendant DEPUTY
2 IGNONT hereby serves the following Requests for Admission on Plaintiff DARRYL GEYER, to
3 be answered, under oath, within thirty (30) days from the date of service.

4
5 **RESPONSE TO REQUEST FOR ADMISSION**

6 **REQUEST FOR ADMISSION NO. 1:**

7 Admit that YOU are not asserting any claims in this action against DEFENDANT.

8 **RESPONSE TO REQUEST FOR ADMISSION NO.1:**

9 Plaintiff DARRYL GEYER denies this request for admission on the grounds that plaintiff
10 was not informed of and does not know the name of all deputies he came into contact with while
11 at Santa Rita Jail. And because of this lack of information, Plaintiff is unable to state whether this
12 particular deputy violated any of plaintiff's constitutional rights.

13 Dated: JULY 19, 2023

LAW OFFICE OF YOLANDA HUANG

14
15 By /s/ Yolanda Huang
16 Yolanda Huang
17 Attorney for Plaintiffs
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PROOF OF SERVICE

Gonzalez, et al. v. Alameda County Sheriff's Office, et al.
Case No. 3:19-cv-07423-JSC

STATE OF CALIFORNIA, COUNTY OF ALAMEDA

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Alameda, State of California. My business address is 2840 Adeline Street, Suite A, Berkeley, CA 94703

On July 19, 2023, I served true copies of the following document(s) described as **Plaintiff Darryl Geyer's Responses to DEFENDANT DEPUTY IGNONT'S RFA TO PLAINTIFF DARRYL GEYER, SET ONE** on the interested parties in this action as follows:

SEE ATTACHED SERVICE LIST

- **BY E-MAIL OR ELECTRONIC TRANSMISSION:** I caused a copy of the document(s) to be sent from e-mail address office@yhuanglaw.com to the persons at the e-mail addresses listed in the Service List. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on July 19, 2023, at Berkeley, California.



JOSHUA PAIZ

SERVICE LIST

**Gonzalez, et al. v. Alameda County Sheriff's Office, et al.
Case No. 3:19-cv-07423-JSC**

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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

ALAMEDA COUNTY MALE PRISONERS And Former Prisoners,
DANIEL GONZALEZ, et al. on behalf of
themselves and others similarly situated, as a
Class, and Subclass;

PLAINTIFFS,

v.

ALAMEDA COUNTY SHERIFF'S OFFICE, ALAMEDA COUNTY, Deputy
Joe, Deputy Ignont (sp) John and Jane ROEs,
Nos. 1 – 25,

DEFENDANTS.

Case No. 3:19-cv-07423-JSC

PLAINTIFF DANIEL GONZALEZ'S
RESPONSE TO INTERROGATORIES
FROM DEFENDANT DEPUTY IGNONT,
SET ONE

Judge: District Judge Jacqueline Scott
Corley

Trial Date: May 6, 2024

RESPONDING PARTY:

Plaintiff DANIEL GONZALEZ

PROPOUNDING PARTY:

Defendant DEPUTY IGNONT

SET NO.:

ONE (1)

Pursuant to Federal Rule of Civil Procedure 36 and 26(d)(1), Defendant DEPUTY IGNONT hereby serves the following Requests for Admission on Plaintiff DANIEL GONZALEZ, to be answered, under oath, within thirty (30) days from the date of service.

RESPONSE TO REQUEST FOR ADMISSION

REQUEST FOR ADMISSION NO. 1:

Admit that YOU are not asserting any claims in this action against DEFENDANT.

RESPONSE TO REQUEST FOR ADMISSION NO.1:

DENY

REQUEST FOR ADMISSION NO. 2:

Admit that YOU did not assert any claims for “adequate sanitation” against COUNTY in YOUR Fifth Amended Complaint.

RESPONSE TO REQUEST FOR ADMISSION NO.2:

ADMIT. Plaintiff Daniel Gonzalez is asserting claims for “inadequate sanitation” against COUNTY in the Fifth Amended Complaint.

REQUEST FOR ADMISSION NO. 3:

Admit that YOU did not assert any claims for “adequate sanitation” against ACSO in YOUR Fifth Amended Complaint.

RESPONSE TO REQUEST FOR ADMISSION NO.3:

ADMIT. Plaintiff Daniel Gonzalez is asserting claims for “inadequate sanitation” against ACSO in the Fifth Amended Complaint.

1 Dated: JULY 19, 2023

LAW OFFICE OF YOLANDA HUANG

2
3 By /s/ Yolanda Huang
4 Yolanda Huang
5 Attorney for Plaintiffs
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PROOF OF SERVICE

**Gonzalez, et al. v. Alameda County Sheriff's Office, et al.
Case No. 3:19-cv-07423-JSC**

STATE OF CALIFORNIA, COUNTY OF ALAMEDA

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Alameda, State of California. My business address is 2840 Adeline Street, Suite A, Berkeley, CA 94703

On July 19, 2023, I served true copies of the following document(s) described as **Plaintiff Daniel Gonzalez's Responses to DEFENDANT DEPUTY IGNONT'S RFA TO PLAINTIFF DANIEL GONZALEZ, SET ONE** on the interested parties in this action as follows:

SEE ATTACHED SERVICE LIST

- **BY E-MAIL OR ELECTRONIC TRANSMISSION:** I caused a copy of the document(s) to be sent from e-mail address office@yhuanglaw.com to the persons at the e-mail addresses listed in the Service List. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on July 19, 2023, at Berkeley, California.



JOSHUA PAIZ

SERVICE LIST

**Gonzalez, et al. v. Alameda County Sheriff's Office, et al.
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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

ALAMEDA COUNTY MALE PRISONERS
And Former Prisoners, DANIEL GONZALEZ,
et al. on behalf of themselves and others
similarly situated, as a Class, and Subclass;

PLAINTIFFS,

v.

ALAMEDA COUNTY SHERIFF'S
OFFICE, ALAMEDA COUNTY, Deputy
Joe, Deputy Ignont (sp) John and Jane ROEs,
Nos. 1 – 25,

DEFENDANTS.

Case No. 3:19-cv-07423-JSC

PLAINTIFF RANDY HARRIS' RESPONSE
TO INTERROGATORIES FROM
DEFENDANT DEPUTY IGNONT,
SET ONE

Judge: District Judge Jacqueline Scott
Corley

Trial Date: May 6, 2024

RESPONDING PARTY:

Plaintiff RANDY HARRIS

PROPOUNDING PARTY:

Defendant DEPUTY IGNONT

SET NO.:

ONE (1)

Pursuant to Federal Rule of Civil Procedure 36 and 26(d)(1), Defendant DEPUTY IGNONT hereby serves the following Requests for Admission on Plaintiff RANDY HARRIS, to be answered, under oath, within thirty (30) days from the date of service.

RESPONSE TO REQUEST FOR ADMISSION

REQUEST FOR ADMISSION NO. 1:

Admit that YOU are not asserting any claims in this action against DEFENDANT.

RESPONSE TO REQUEST FOR ADMISSION NO.1:

Plaintiff RANDY HARRIS denies this request for admission on the grounds that plaintiff was not informed of and does not know the name of all deputies he came into contact with while at Santa Rita Jail. And because of this lack of information, Plaintiff is unable to state whether this particular deputy violated any of plaintiff's constitutional rights.

REQUEST FOR ADMISSION NO. 2:

Admit that YOU did not assert any claims for "adequate sanitation" against COUNTY in YOUR Fifth Amended Complaint.

RESPONSE TO REQUEST FOR ADMISSION NO.2:

ADMIT. Plaintiff Randy Harris is asserting claims for "inadequate sanitation" against COUNTY in the Fifth Amended Complaint.

REQUEST FOR ADMISSION NO. 3:

Admit that YOU did not assert any claims for "adequate sanitation" against ACSO in YOUR Fifth Amended Complaint.

RESPONSE TO REQUEST FOR ADMISSION NO.3:

ADMIT. Plaintiff Randy Harris is asserting claims for "inadequate sanitation" against ACSO in

1 the Fifth Amended Complaint.

2
3 Dated: JULY 19, 2023

LAW OFFICE OF YOLANDA HUANG

4
5 By /s/ Yolanda Huang
6 Yolanda Huang
7 Attorney for Plaintiffs
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PROOF OF SERVICE

Gonzalez, et al. v. Alameda County Sheriff's Office, et al.
Case No. 3:19-cv-07423-JSC

STATE OF CALIFORNIA, COUNTY OF ALAMEDA

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Alameda, State of California. My business address is 2840 Adeline Street, Suite A, Berkeley, CA 94703

On July 19, 2023, I served true copies of the following document(s) described as **Plaintiff Randy Harris' Responses to DEFENDANT DEPUTY IGNONT'S RFA TO PLAINTIFF RANDY HARRIS, SET ONE** on the interested parties in this action as follows:

SEE ATTACHED SERVICE LIST

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I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on July 19, 2023, at Berkeley, California.



JOSHUA PAIZ

SERVICE LIST

**Gonzalez, et al. v. Alameda County Sheriff's Office, et al.
Case No. 3:19-cv-07423-JSC**

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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

ALAMEDA COUNTY MALE PRISONERS
And Former Prisoners, DANIEL GONZALEZ,
et al. on behalf of themselves and others
similarly situated, as a Class, and Subclass;

PLAINTIFFS,

v.

ALAMEDA COUNTY SHERIFF'S
OFFICE, ALAMEDA COUNTY, Deputy
Joe, Deputy Ignont (sp) John and Jane ROEs,
Nos. 1 – 25,

DEFENDANTS.

Case No. 3:19-cv-07423-JSC

PLAINTIFF CEDRIC HENRY'S RESPONSE
TO INTERROGATORIES FROM
DEFENDANT DEPUTY IGNONT,
SET ONE

Judge: District Judge Jacqueline Scott
Corley

Trial Date: May 6, 2024

RESPONDING PARTY:

Plaintiff CEDRIC HENRY

PROPOUNDING PARTY:

Defendant DEPUTY IGNONT

SET NO.:

ONE (1)

1 Pursuant to Federal Rule of Civil Procedure 36 and 26(d)(1), Defendant DEPUTY
2 IGNONT hereby serves the following Requests for Admission on Plaintiff CEDRIC HENRY, to
3 be answered, under oath, within thirty (30) days from the date of service.

4
5 **RESPONSE TO REQUEST FOR ADMISSION**

6 **REQUEST FOR ADMISSION NO. 1:**

7 Admit that YOU are not asserting any claims in this action against DEFENDANT.

8 **RESPONSE TO REQUEST FOR ADMISSION NO.1:**

9 Plaintiff CEDRIC HENRY denies this request for admission on the grounds that plaintiff
10 was not informed of and does not know the name of all deputies he came into contact with while
11 at Santa Rita Jail. And because of this lack of information, Plaintiff is unable to state whether this
12 particular deputy violated any of plaintiff's constitutional rights.

13 Dated: JULY 19, 2023

LAW OFFICE OF YOLANDA HUANG

14
15 By /s/ Yolanda Huang
16 Yolanda Huang
17 Attorney for Plaintiffs
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PROOF OF SERVICE

Gonzalez, et al. v. Alameda County Sheriff's Office, et al.
Case No. 3:19-cv-07423-JSC

STATE OF CALIFORNIA, COUNTY OF ALAMEDA

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Alameda, State of California. My business address is 2840 Adeline Street, Suite A, Berkeley, CA 94703

On July 19, 2023, I served true copies of the following document(s) described as **Plaintiff Cedric Henry's Responses to DEFENDANT DEPUTY IGNONT'S RFA TO PLAINTIFF CEDRIC HENRY, SET ONE** on the interested parties in this action as follows:

SEE ATTACHED SERVICE LIST

- **BY E-MAIL OR ELECTRONIC TRANSMISSION:** I caused a copy of the document(s) to be sent from e-mail address office@yhuanglaw.com to the persons at the e-mail addresses listed in the Service List. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on July 19, 2023, at Berkeley, California.



JOSHUA PAIZ

SERVICE LIST

Gonzalez, et al. v. Alameda County Sheriff's Office, et al.
Case No. 3:19-cv-07423-JSC

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Peter James Van Zandt

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Leawood, Kansas 66209
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Email: tomnanney@gmail.com

Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

ALAMEDA COUNTY MALE PRISONERS
And Former Prisoners, DANIEL GONZALEZ,
et al. on behalf of themselves and others
similarly situated, as a Class, and Subclass;

PLAINTIFFS,

v.

ALAMEDA COUNTY SHERIFF'S OFFICE,
ALAMEDA COUNTY, Deputy Joe, Deputy
Ignont (sp) John and Jane ROEs, Nos. 1 – 25,

DEFENDANTS.

Case No. 3:19-cv-07423-JSC

PLAINTIFF MICHAEL LOCKHART'S
RESPONSE TO INTERROGATORIES
FROM DEFENDANT DEPUTY IGNONT,
SET ONE

Judge: District Judge Jacqueline Scott
Corley

Trial Date: May 6, 2024

RESPONDING PARTY:

Plaintiff MICHAEL LOCKHART

PROPOUNDING PARTY:

Defendant DEPUTY IGNONT

SET NO.:

ONE (1)

Pursuant to Federal Rule of Civil Procedure 36 and 26(d)(1), Defendant DEPUTY IGNONT hereby serves the following Requests for Admission on Plaintiff MICHAEL LOCKHART, to be answered, under oath, within thirty (30) days from the date of service.

RESPONSE TO REQUEST FOR ADMISSION

REQUEST FOR ADMISSION NO. 1:

Admit that YOU are not asserting any claims in this action against DEFENDANT.

RESPONSE TO REQUEST FOR ADMISSION NO.1:

Plaintiff MICHAEL LOCKHART denies this request for admission on the grounds that plaintiff was not informed of and does not know the name of all deputies he came into contact with while at Santa Rita Jail. And because of this lack of information, Plaintiff is unable to state whether this particular deputy violated any of plaintiff's constitutional rights.

REQUEST FOR ADMISSION NO. 2:

Admit that YOU did not assert any claims for "adequate sanitation" against COUNTY in YOUR Fifth Amended Complaint.

RESPONSE TO REQUEST FOR ADMISSION NO.2:

ADMIT. Plaintiff Michael Lockhart is asserting claims for "inadequate sanitation" against COUNTY in the Fifth Amended Complaint.

REQUEST FOR ADMISSION NO. 3:

Admit that YOU did not assert any claims for "adequate sanitation" against ACSO in YOUR Fifth Amended Complaint.

RESPONSE TO REQUEST FOR ADMISSION NO.3:

ADMIT. Plaintiff Michael Lockhart is asserting claims for "inadequate sanitation" against ACSO in the Fifth Amended Complaint.

1 Dated: JULY 19, 2023

LAW OFFICE OF YOLANDA HUANG

2
3 By /s/ Yolanda Huang

Yolanda Huang

4 Attorney for Plaintiffs

PROOF OF SERVICE

Gonzalez, et al. v. Alameda County Sheriff's Office, et al.
Case No. 3:19-cv-07423-JSC

STATE OF CALIFORNIA, COUNTY OF ALAMEDA

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Alameda, State of California. My business address is 2840 Adeline Street, Suite A, Berkeley, CA 94703

On July 19, 2023, I served true copies of the following document(s) described as **Plaintiff Michael Lockhart's Responses to DEFENDANT DEPUTY JOE'S RFA TO PLAINTIFF MICHAEL LOCKHART, SET ONE** on the interested parties in this action as follows:

SEE ATTACHED SERVICE LIST

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I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on July 19, 2023, at Berkeley, California.



JOSHUA PAIZ

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**Gonzalez, et al. v. Alameda County Sheriff's Office, et al.
Case No. 3:19-cv-07423-JSC**

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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

ALAMEDA COUNTY MALE PRISONERS
And Former Prisoners, DANIEL GONZALEZ,
et al. on behalf of themselves and others
similarly situated, as a Class, and Subclass;

PLAINTIFFS,

v.

ALAMEDA COUNTY SHERIFF'S OFFICE,
ALAMEDA COUNTY, Deputy Joe, Deputy
Ignont (sp) John and Jane ROEs, Nos. 1 – 25,

DEFENDANTS.

Case No. 3:19-cv-07423-JSC

PLAINTIFF JAMES MALLETT'S
RESPONSE TO INTERROGATORIES
FROM DEFENDANT DEPUTY IGNONT,
SET ONE

Judge: District Judge Jacqueline Scott
Corley

Trial Date: May 6, 2024

RESPONDING PARTY:

Plaintiff JAMES MALLETT

PROPOUNDING PARTY:

Defendant DEPUTY IGNONT

SET NO.:

ONE (1)

1 Pursuant to Federal Rule of Civil Procedure 36 and 26(d)(1), Defendant DEPUTY
2 IGNONT hereby serves the following Requests for Admission on Plaintiff JAMES MALLET, to
3 be answered, under oath, within thirty (30) days from the date of service.

4
5 **RESPONSE TO REQUEST FOR ADMISSION**

6 **REQUEST FOR ADMISSION NO. 1:**

7 Admit that YOU are not asserting any claims in this action against DEFENDANT.

8 **RESPONSE TO REQUEST FOR ADMISSION NO.1:**

9 Plaintiff JAMES MALLET denies this request for admission on the grounds that plaintiff
10 was not informed of and does not know the name of all deputies he came into contact with while
11 at Santa Rita Jail. And because of this lack of information, Plaintiff is unable to state whether this
12 particular deputy violated any of plaintiff's constitutional rights.

13 Dated: JULY 19, 2023

LAW OFFICE OF YOLANDA HUANG

14
15 By /s/ Yolanda Huang

16 Yolanda Huang
17 Attorney for Plaintiffs
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PROOF OF SERVICE

Gonzalez, et al. v. Alameda County Sheriff's Office, et al.
Case No. 3:19-cv-07423-JSC

STATE OF CALIFORNIA, COUNTY OF ALAMEDA

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Alameda, State of California. My business address is 2840 Adeline Street, Suite A, Berkeley, CA 94703

On July 19, 2023, I served true copies of the following document(s) described as **Plaintiff James Mallett's Responses to DEFENDANT DEPUTY IGNONT'S RFA TO PLAINTIFF JAMES MALLET, SET ONE** on the interested parties in this action as follows:

SEE ATTACHED SERVICE LIST

- **BY E-MAIL OR ELECTRONIC TRANSMISSION:** I caused a copy of the document(s) to be sent from e-mail address office@yhuanglaw.com to the persons at the e-mail addresses listed in the Service List. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on July 19, 2023, at Berkeley, California.



JOSHUA PAIZ

SERVICE LIST

**Gonzalez, et al. v. Alameda County Sheriff's Office, et al.
Case No. 3:19-cv-07423-JSC**

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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

ALAMEDA COUNTY MALE PRISONERS
And Former Prisoners, DANIEL GONZALEZ,
et al. on behalf of themselves and others
similarly situated, as a Class, and Subclass;

PLAINTIFFS,

v.

ALAMEDA COUNTY SHERIFF'S
OFFICE, ALAMEDA COUNTY, Deputy
Joe, Deputy Ignont (sp) John and Jane ROEs,
Nos. 1 – 25,

DEFENDANTS.

Case No. 3:19-cv-07423-JSC

PLAINTIFF DAVID MISCH'S RESPONSE
TO INTERROGATORIES FROM
DEFENDANT DEPUTY IGNONT,
SET ONE

Judge: District Judge Jacqueline Scott
Corley

Trial Date: May 6, 2024

RESPONDING PARTY:

Plaintiff DAVID MISCH

PROPOUNDING PARTY:

Defendant DEPUTY IGNONT

SET NO.:

ONE (1)

1 Pursuant to Federal Rule of Civil Procedure 36 and 26(d)(1), Defendant DEPUTY
2 IGNONT hereby serves the following Requests for Admission on Plaintiff DAVID MISCH, to be
3 answered, under oath, within thirty (30) days from the date of service.

4
5 **RESPONSE TO REQUEST FOR ADMISSION**

6 **REQUEST FOR ADMISSION NO. 1:**

7 Admit that YOU are not asserting any claims in this action against DEFENDANT.

8 **RESPONSE TO REQUEST FOR ADMISSION NO.1:**

9 Plaintiff DAVID MISCH denies this request for admission on the grounds that plaintiff
10 was not informed of and does not know the name of all deputies he came into contact with while
11 at Santa Rita Jail. And because of this lack of information, Plaintiff is unable to state whether this
12 particular deputy violated any of plaintiff's constitutional rights.

13 Dated: JULY 19, 2023

LAW OFFICE OF YOLANDA HUANG

14
15 By /s/ Yolanda Huang
16 Yolanda Huang
17 Attorney for Plaintiffs
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PROOF OF SERVICE

Gonzalez, et al. v. Alameda County Sheriff's Office, et al.
Case No. 3:19-cv-07423-JSC

STATE OF CALIFORNIA, COUNTY OF ALAMEDA

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Alameda, State of California. My business address is 2840 Adeline Street, Suite A, Berkeley, CA 94703

On July 19, 2023, I served true copies of the following document(s) described as **Plaintiff David Misch's Responses to DEFENDANT DEPUTY IGNONT'S RFA TO PLAINTIFF DAVID MISCH, SET ONE** on the interested parties in this action as follows:

SEE ATTACHED SERVICE LIST

- **BY E-MAIL OR ELECTRONIC TRANSMISSION:** I caused a copy of the document(s) to be sent from e-mail address office@yhuanglaw.com to the persons at the e-mail addresses listed in the Service List. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on July 19, 2023, at Berkeley, California.



JOSHUA PAIZ

SERVICE LIST

**Gonzalez, et al. v. Alameda County Sheriff's Office, et al.
Case No. 3:19-cv-07423-JSC**

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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

ALAMEDA COUNTY MALE PRISONERS
And Former Prisoners, DANIEL GONZALEZ,
et al. on behalf of themselves and others
similarly situated, as a Class, and Subclass;

PLAINTIFFS,

v.

ALAMEDA COUNTY SHERIFF'S OFFICE,
ALAMEDA COUNTY, Deputy Joe, Deputy
Ignont (sp) John and Jane ROEs, Nos. 1 – 25,

DEFENDANTS.

Case No. 3:19-cv-07423-JSC

PLAINTIFF TIMOTHY PHILLIPS'
RESPONSE TO INTERROGATORIES
FROM DEFENDANT DEPUTY IGNONT,
SET ONE

Judge: District Judge Jacqueline Scott
Corley

Trial Date: May 6, 2024

RESPONDING PARTY:

Plaintiff TIMOTHY PHILLIPS

PROPOUNDING PARTY:

Defendant DEPUTY IGNONT

SET NO.:

ONE (1)

1 Pursuant to Federal Rule of Civil Procedure 36 and 26(d)(1), Defendant DEPUTY
2 IGNONT hereby serves the following Requests for Admission on Plaintiff TIMOTHY PHILLIPS,
3 to be answered, under oath, within thirty (30) days from the date of service.

4
5 **RESPONSES TO REQUESTS FOR ADMISSION**

6 **REQUEST FOR ADMISSION NO. 1:**

7 Admit that YOU are not asserting any claims in this action against DEFENDANT.

8 **RESPONSE TO REQUEST FOR ADMISSION NO.1:**

9 Plaintiff TIMOTHY PHILLIPS denies this request for admission on the grounds that
10 plaintiff was not informed of and does not know the name of all deputies he came into contact
11 with while at Santa Rita Jail. And because of this lack of information, Plaintiff is unable to state
12 whether this particular deputy violated any of plaintiff's constitutional rights.

13 Dated: JULY 19, 2023

LAW OFFICE OF YOLANDA HUANG

14
15 By /s/ Yolanda Huang
16 Yolanda Huang
17 Attorney for Plaintiffs
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PROOF OF SERVICE

Gonzalez, et al. v. Alameda County Sheriff's Office, et al.
Case No. 3:19-cv-07423-JSC

STATE OF CALIFORNIA, COUNTY OF ALAMEDA

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Alameda, State of California. My business address is 2840 Adeline Street, Suite A, Berkeley, CA 94703

On July 19, 2023, I served true copies of the following document(s) described as **Plaintiff Timothy Phillips' Responses to DEFENDANT DEPUTY IGNONT'S RFA TO PLAINTIFF TIMOTHY PHILLIPS, SET ONE** on the interested parties in this action as follows:

SEE ATTACHED SERVICE LIST

- **BY E-MAIL OR ELECTRONIC TRANSMISSION:** I caused a copy of the document(s) to be sent from e-mail address office@yhuanglaw.com to the persons at the e-mail addresses listed in the Service List. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on July 19, 2023, at Berkeley, California.



JOSHUA PAIZ

SERVICE LIST

**Gonzalez, et al. v. Alameda County Sheriff's Office, et al.
Case No. 3:19-cv-07423-JSC**

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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

ALAMEDA COUNTY MALE PRISONERS
And Former Prisoners, DANIEL GONZALEZ,
et al. on behalf of themselves and others
similarly situated, as a Class, and Subclass;

PLAINTIFFS,

v.

ALAMEDA COUNTY SHERIFF'S
OFFICE, ALAMEDA COUNTY, Deputy
Joe, Deputy Ignont (sp) John and Jane ROEs,
Nos. 1 – 25,

DEFENDANTS.

Case No. 3:19-cv-07423-JSC

PLAINTIFF ERIC RIVERA'S RESPONSE
TO INTERROGATORIES FROM
DEFENDANT DEPUTY IGNONT,
SET ONE

Judge: District Judge Jacqueline Scott
Corley

Trial Date: May 6, 2024

RESPONDING PARTY:

Plaintiff ERIC RIVERA

PROPOUNDING PARTY:

Defendant DEPUTY IGNONT

SET NO.:

ONE (1)

1 Pursuant to Federal Rule of Civil Procedure 36 and 26(d)(1), Defendant DEPUTY
2 IGNONT hereby serves the following Requests for Admission on Plaintiff ERIC RIVERA, to be
3 answered, under oath, within thirty (30) days from the date of service.

4
5 **RESPONSE TO REQUEST FOR ADMISSION**

6 **REQUEST FOR ADMISSION NO. 1:**

7 Admit that YOU are not asserting any claims in this action against DEFENDANT.

8 **RESPONSE TO REQUEST FOR ADMISSION NO.1:**

9 Plaintiff ERIC RIVERA denies this request for admission on the grounds that plaintiff was
10 not informed of and does not know the name of all deputies he came into contact with while at
11 Santa Rita Jail. And because of this lack of information, Plaintiff is unable to state whether this
12 particular deputy violated any of plaintiff's constitutional rights.

13 Dated: JULY 19, 2023

LAW OFFICE OF YOLANDA HUANG

14
15 By /s/ Yolanda Huang
16 Yolanda Huang
17 Attorney for Plaintiffs
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PROOF OF SERVICE

Gonzalez, et al. v. Alameda County Sheriff's Office, et al.
Case No. 3:19-cv-07423-JSC

STATE OF CALIFORNIA, COUNTY OF ALAMEDA

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Alameda, State of California. My business address is 2840 Adeline Street, Suite A, Berkeley, CA 94703

On July 19, 2023, I served true copies of the following document(s) described as **Plaintiff Eric Rivera's Responses to DEFENDANT DEPUTY IGNONT'S RFA TO PLAINTIFF ERIC RIVERA, SET ONE** on the interested parties in this action as follows:

SEE ATTACHED SERVICE LIST

- **BY E-MAIL OR ELECTRONIC TRANSMISSION:** I caused a copy of the document(s) to be sent from e-mail address office@yhuanglaw.com to the persons at the e-mail addresses listed in the Service List. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on July 19, 2023, at Berkeley, California.



JOSHUA PAIZ

SERVICE LIST

**Gonzalez, et al. v. Alameda County Sheriff's Office, et al.
Case No. 3:19-cv-07423-JSC**

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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

ALAMEDA COUNTY MALE PRISONERS
And Former Prisoners, DANIEL GONZALEZ,
et al. on behalf of themselves and others
similarly situated, as a Class, and Subclass;

PLAINTIFFS,

v.

ALAMEDA COUNTY SHERIFF'S OFFICE,
ALAMEDA COUNTY, Deputy Joe, Deputy
Ignont (sp) John and Jane ROEs, Nos. 1 – 25,

DEFENDANTS.

Case No. 3:19-cv-07423-JSC

PLAINTIFF RASHEED TUCKER'S
RESPONSE TO INTERROGATORIES
FROM DEFENDANT DEPUTY IGNONT,
SET ONE

Judge: District Judge Jacqueline Scott
Corley

Trial Date: May 6, 2024

RESPONDING PARTY: Plaintiff RASHEED TUCKER

PROPOUNDING PARTY: Defendant DEPUTY IGNONT

SET NO.: ONE (1)

1 Pursuant to Federal Rule of Civil Procedure 36 and 26(d)(1), Defendant DEPUTY
2 IGNONT hereby serves the following Requests for Admission on Plaintiff RASHEED TUCKER,
3 to be answered, under oath, within thirty (30) days from the date of service.

4
5 **RESPONSE TO REQUEST FOR ADMISSION**

6 **REQUEST FOR ADMISSION NO. 1:**

7 Admit that YOU are not asserting any claims in this action against DEFENDANT.

8 **RESPONSE TO REQUEST FOR ADMISSION NO.1:**

9 Plaintiff RASHEED TUCKER denies this request for admission on the grounds that
10 plaintiff was not informed of and does not know the name of all deputies he came into contact
11 with while at Santa Rita Jail. And because of this lack of information, Plaintiff is unable to state
12 whether this particular deputy violated any of plaintiff's constitutional rights.

13 Dated: JULY 19, 2023

LAW OFFICE OF YOLANDA HUANG

14
15 By /s/ Yolanda Huang

16 Yolanda Huang
17 Attorney for Plaintiffs
18
19
20
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PROOF OF SERVICE

Gonzalez, et al. v. Alameda County Sheriff's Office, et al.
Case No. 3:19-cv-07423-JSC

STATE OF CALIFORNIA, COUNTY OF ALAMEDA

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Alameda, State of California. My business address is 2840 Adeline Street, Suite A, Berkeley, CA 94703

On July 19, 2023, I served true copies of the following document(s) described as **Plaintiff Rasheed Tucker's Responses to DEFENDANT DEPUTY IGNONT'S RFA TO PLAINTIFF RASHEED TUCKER, SET ONE** on the interested parties in this action as follows:

SEE ATTACHED SERVICE LIST

- **BY E-MAIL OR ELECTRONIC TRANSMISSION:** I caused a copy of the document(s) to be sent from e-mail address office@yhuanglaw.com to the persons at the e-mail addresses listed in the Service List. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on July 19, 2023, at Berkeley, California.



JOSHUA PAIZ

SERVICE LIST

**Gonzalez, et al. v. Alameda County Sheriff's Office, et al.
Case No. 3:19-cv-07423-JSC**

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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

ALAMEDA COUNTY MALE PRISONERS
And Former Prisoners, DANIEL GONZALEZ,
et al. on behalf of themselves and others
similarly situated, as a Class, and Subclass;

PLAINTIFFS,

v.

ALAMEDA COUNTY SHERIFF'S
OFFICE, ALAMEDA COUNTY, Deputy Joe,
Deputy Ignont (sp) John and Jane ROEs, Nos. 1
– 25,

DEFENDANTS.

Case No. 3:19-cv-07423-JSC

PLAINTIFF TIKISHA UPSHAW'S
RESPONSE TO INTERROGATORIES
FROM DEFENDANT DEPUTY IGNONT,
SET ONE

Judge: District Judge Jacqueline Scott
Corley

Trial Date: May 6, 2024

RESPONDING PARTY:

Plaintiff TIKISHA UPSHAW

PROPOUNDING PARTY:

Defendant DEPUTY IGNONT

SET NO.:

ONE (1)

Pursuant to Federal Rule of Civil Procedure 36 and 26(d)(1), Defendant DEPUTY IGNONT hereby serves the following Requests for Admission on Plaintiff TIKISHA UPSHAW, to be answered, under oath, within thirty (30) days from the date of service.

REQUESTS FOR ADMISSION

REQUEST FOR ADMISSION NO. 1:

Admit that YOU are not asserting any claims in this action against DEFENDANT.

RESPONSE TO REQUEST FOR ADMISSION NO.1:

Plaintiff TIKISHA UPSHAW denies this request for admission on the grounds that plaintiff was not informed of and does not know the name of all deputies she came into contact with while at Santa Rita Jail. And because of this lack of information, Plaintiff is unable to state whether this particular deputy violated any of plaintiff's constitutional rights.

REQUEST FOR ADMISSION NO. 2:

Admit that YOU did not assert any claims for "adequate sanitation" against COUNTY in YOUR Fifth Amended Complaint.

RESPONSE TO REQUEST FOR ADMISSION NO.2:

ADMIT. Plaintiff Tikisha Upshaw is asserting claims for "inadequate sanitation" against COUNTY in the Fifth Amended Complaint.

REQUEST FOR ADMISSION NO. 3:

Admit that YOU did not assert any claims for "adequate sanitation" against ACSO in YOUR Fifth Amended Complaint.

RESPONSE TO REQUEST FOR ADMISSION NO.3:

1 ADMIT. Plaintiff Tikisha Upshaw is asserting claims for “inadequate sanitation” against ACSO
2 in the Fifth Amended Complaint.

3 Dated: JULY 19, 2023

LAW OFFICE OF YOLANDA HUANG

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5 By /s/ Yolanda Huang
6 Yolanda Huang
7 Attorney for Plaintiffs
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PROOF OF SERVICE

Gonzalez, et al. v. Alameda County Sheriff's Office, et al.
Case No. 3:19-cv-07423-JSC

STATE OF CALIFORNIA, COUNTY OF ALAMEDA

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Alameda, State of California. My business address is 2840 Adeline Street, Suite A, Berkeley, CA 94703

On July 19, 2023, I served true copies of the following document(s) described as **Plaintiff Tikisha Upshaw's Responses to DEFENDANT DEPUTY IGNONT'S RFA TO PLAINTIFF TIKISHA UPSHAW, SET ONE** on the interested parties in this action as follows:

SEE ATTACHED SERVICE LIST

- **BY E-MAIL OR ELECTRONIC TRANSMISSION:** I caused a copy of the document(s) to be sent from e-mail address office@yhuanglaw.com to the persons at the e-mail addresses listed in the Service List. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on July 19, 2023, at Berkeley, California.



JOSHUA PAIZ

SERVICE LIST

**Gonzalez, et al. v. Alameda County Sheriff's Office, et al.
Case No. 3:19-cv-07423-JSC**

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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

ALAMEDA COUNTY MALE PRISONERS
And Former Prisoners, DANIEL GONZALEZ,
et al. on behalf of themselves and others
similarly situated, as a Class, and Subclass;

PLAINTIFFS,

v.

ALAMEDA COUNTY SHERIFF'S
OFFICE, ALAMEDA COUNTY, Deputy Joe,
Deputy Ignont (sp) John and Jane ROEs, Nos. 1
– 25,

DEFENDANTS.

Case No. 3:19-cv-07423-JSC

PLAINTIFF ERIC WAYNE'S RESPONSE
TO INTERROGATORIES FROM
DEFENDANT DEPUTY IGNONT,
SET ONE

Judge: District Judge Jacqueline Scott
Corley

Trial Date: May 6, 2024

RESPONDING PARTY:

Plaintiff ERIC WAYNE

PROPOUNDING PARTY:

Defendant DEPUTY IGNONT

SET NO.:

ONE (1)

1 Pursuant to Federal Rule of Civil Procedure 36 and 26(d)(1), Defendant DEPUTY
2 IGNONT hereby serves the following Requests for Admission on Plaintiff ERIC WAYNE, to be
3 answered, under oath, within thirty (30) days from the date of service.

4
5 **RESPONSE TO REQUEST FOR ADMISSION**

6 **REQUEST FOR ADMISSION NO. 1:**

7 Admit that YOU are not asserting any claims in this action against DEFENDANT.

8 **RESPONSE TO REQUEST FOR ADMISSION NO.1:**

9 Plaintiff ERIC WAYNE denies this request for admission on the grounds that plaintiff was
10 not informed of and does not know the name of all deputies he came into contact with while at
11 Santa Rita Jail. And because of this lack of information, Plaintiff is unable to state whether this
12 particular deputy violated any of plaintiff's constitutional rights.

13 Dated: JULY 19, 2023

LAW OFFICE OF YOLANDA HUANG

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15 By /s/ Yolanda Huang
16 Yolanda Huang
17 Attorney for Plaintiffs
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PROOF OF SERVICE

Gonzalez, et al. v. Alameda County Sheriff's Office, et al.
Case No. 3:19-cv-07423-JSC

STATE OF CALIFORNIA, COUNTY OF ALAMEDA

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Alameda, State of California. My business address is 2840 Adeline Street, Suite A, Berkeley, CA 94703

On July 19, 2023, I served true copies of the following document(s) described as **Plaintiff Eric Wayne's Responses to DEFENDANT DEPUTY IGNONT'S RFA TO PLAINTIFF ERIC WAYNE, SET ONE** on the interested parties in this action as follows:

SEE ATTACHED SERVICE LIST

- **BY E-MAIL OR ELECTRONIC TRANSMISSION:** I caused a copy of the document(s) to be sent from e-mail address office@yhuanglaw.com to the persons at the e-mail addresses listed in the Service List. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on July 19, 2023, at Berkeley, California.



JOSHUA PAIZ

SERVICE LIST

**Gonzalez, et al. v. Alameda County Sheriff's Office, et al.
Case No. 3:19-cv-07423-JSC**

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